

LEO FOX
ATTORNEY-AT-LAW

630 Third Avenue, New York, New York 10017
(212) 867-9595 Fax (212) 949-1857
E-Mail: leo@leofoxlaw.com

February 16, 2018

Honorable Michael E. Wiles
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, New York 10004-1408

Re: 15 John Corp.
Case No. 16-12453 (MEW)

Dear Judge Wiles:

Responding briefly and apologetically, I enclose the chain of emails regarding this matter. I do not see why this matter needs to be further extended from its early October 2017 filing date particularly where there is only a vague explanation of an unidentified case and there is no further substantiation regarding classes and tests. Mr. Lajaunie's travel expense will not change significantly on any of these days, if this matter were to go to April 2018.

I am available March 8, 2018 at 2:00 p.m., March 9, 12, 14, 15, 16, 19, 20, 21, 22, 23, and 26, 2018. I assume that Mr. Lajaunie will not require more than one (1) day to present his case.

I would also ask for the documents and names of witnesses that Mr. Lajaunie intends to submit at least seven (7) days before the hearings. In light of the fact that there exists thousands of emails here, it will take some time to go through this file to respond to Mr. Lajaunie's comments.

Thank you.

Very truly yours,

/s/ Leo Fox

LF:cb
Enclosure

cc: Richard Morrissey, Esq.
Neil Berger, Esq.
Philip Lajaunie

Leo Fox

From: pl@firstadmininc.com
Sent: Friday, February 16, 2018 2:16 PM
To: Leo Fox
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Mr. Fox,

I have explained too many times, but knowing how you proceeds, you will keep arguing despite any explanations.

In terms of the other dates, despite my explanations, you are mixing four different situations into an unintelligible calendar.

As for your Expedia search, how do you know what the prices were 45 days ago? Your assumption that prices do not vary over time is nonsensical. In any case, the prices now are over \$1,000.

You have not responded to my question asking you what the Rules you are referring to, are. Are you trying to lie to me again?

PL

From: Leo Fox [mailto:leo@leofoxlaw.com]
Sent: Friday, February 16, 2018 2:07 PM
To: pl@firstadmininc.com
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Philip:

You have not explained your inability to be in New York on February 21, 22 or 23, 2017.

The Docket Sheet in the Chicago Case for December 2017 or January 2018 does not reflect a February 21, 22, or 23 hearing date. Could you please specify what document scheduled a hearing on those days and when the date was changed. The only reference in February 2017 appears to be the Plaintiff's hearing on a Motion to Dismiss your Counterclaims which had been scheduled for February 8, 2018 and in which you were given a response time of March 8, 2018 with the Plaintiff's Reply by March 22, 2018. In fact, it appears that if that Motion is scheduled to be heard on March 28, 2018, you should be there because of its importance. In the Wyoming Case, it appears you did have a February 20, 2018 pre-trial date scheduled in September 2017 which apparently was agreed to be adjourned based on the Motion made on January 5, 2018. The bottom line is you have not explained why you cannot be here on any of the 3 days February 21, 22 and 23, 2018.

You again raise the mysterious "training and exams" which you do not explain. Please advise me as to what school you are attending and what exams you are taking that do not permit you to appear on one of the days listed above.

I checked with Expedia there are numerous flights available from Wyoming to New York. The cost of the flights does not vary if you order that flight today than if you had ordered that flight last month.

Leo Fox, Esq.

630 Third Avenue - 18th Floor
New York, New York 10017
(212) 867-9595 (Office)
(212) 949-1857 (Fax)
leo@leofoxlaw.com

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: pl@firstadmininc.com [<mailto:pl@firstadmininc.com>]
Sent: Friday, February 16, 2018 12:59 PM
To: Leo Fox <leo@leofoxlaw.com>
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Mr. Fox,

Re: Feb 22, 23: back in December, I had a Hearing scheduled for Feb 21, which got continued to March 20 because of a change in Judges. I have made an application to continue that Hearing to April 4. The consequence is that I did not buy a ticket to be in NYC on Feb 21. It is too late to do so now.

Re: professional and personal matters: in the meantime, I have taken on more training and exams, for which I have paid already.

Re: Rewards: there are three dates:

- March 1, over the phone
- March 15, in person in Chicago
- March 28, in person in Chicago, depending on what happens on March 15. This is the one I am offering to you, as I am fairly confident of that date.

Re: documents and witnesses: what Rules are you referring to?

PL

From: Leo Fox [<mailto:leo@leofoxlaw.com>]
Sent: Friday, February 16, 2018 10:48 AM
To: pl@firstadmininc.com
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Leo Fox

From: pl@firstadmininc.com
Sent: Friday, February 16, 2018 12:59 PM
To: Leo Fox
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Mr. Fox,

Re: Feb 22, 23: back in December, I had a Hearing scheduled for Feb 21, which got continued to March 20 because of a change in Judges. I have made an application to continue that Hearing to April 4. The consequence is that I did not buy a ticket to be in NYC on Feb 21. It is too late to do so now.

Re: professional and personal matters: in the meantime, I have taken on more training and exams, for which I have paid already.

Re: Rewards: there are three dates:

- March 1, over the phone
- March 15, in person in Chicago
- March 28, in person in Chicago, depending on what happens on March 15. This is the one I am offering to you, as I am fairly confident of that date.

Re: documents and witnesses: what Rules are you referring to?

PL

From: Leo Fox [mailto:leo@leofoxlaw.com]
Sent: Friday, February 16, 2018 10:48 AM
To: pl@firstadmininc.com
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Philip:

Please explain why you cannot make it on February 22, 2018 or February 23, 2018 when you previously indicated you were available. If there are exams scheduled in February, I am sure we can get those extended if you give me the details.

The docket of the case in Chicago (16-cv-09952 Northern District of Illinois) involving Rewards Network does not appear to have any schedule for those days. In fact, there are a number of different matters in March that you need to appear either in person or by telephone which would clearly make March less convenient to you than February.

Please also provide me with all the "sheer quantity of exhibits" and the "witnesses" that you plan on calling as required by the Federal Rules.

Thank you.

Leo Fox, Esq.

630 Third Avenue - 18th Floor
New York, New York 10017
(212) 867-9595 (Office)
(212) 949-1857 (Fax)
leo@leofoxlaw.com

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: pl@firstadmininc.com [<mailto:pl@firstadmininc.com>]
Sent: Thursday, February 15, 2018 7:42 PM
To: Leo Fox <leo@leofoxlaw.com>
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Mr. Fox,
As we have discussed already, I simply cannot make it in February, and especially while you are detaining my personal funds.
Because of the importance of this hearing, I cannot take the risk of appearing by phone, especially with the sheer quantity of exhibits I will have to present, as well as the witnesses.
The only solution I see prior to your trip, is that the March 28 Hearing in Chicago might be continued, or cancelled, in which case I would extend my trip into NY.
Please send my money back.
Thank you

PL

From: Leo Fox [<mailto:leo@leofoxlaw.com>]
Sent: Thursday, February 15, 2018 5:44 PM
To: Svetlana Eisenberg@nysb.uscourts.gov; pl@firstadmininc.com
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Philip:

I am available February 22, 2018, February 23, 2018, February 26, 2018 in the morning and February 27, 2018 March 8, 2018 at 2:00 p.m. and March 9, 2018.

Please advise which days you are available.

Leo Fox, Esq.

630 Third Avenue

Leo Fox

From: pl@firstadmininc.com
Sent: Thursday, February 15, 2018 7:42 PM
To: Leo Fox
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Mr. Fox,

As we have discussed already, I simply cannot make it in February, and especially while you are detaining my personal funds.

Because of the importance of this hearing, I cannot take the risk of appearing by phone, especially with the sheer quantity of exhibits I will have to present, as well as the witnesses.

The only solution I see prior to your trip, is that the March 28 Hearing in Chicago might be continued, or cancelled, in which case I would extend my trip into NY.

Please send my money back.

Thank you

PL

From: Leo Fox [mailto:leo@leofoxlaw.com]
Sent: Thursday, February 15, 2018 5:44 PM
To: Svetlana_Eisenberg@nysb.uscourts.gov; pl@firstadmininc.com
Subject: RE: 15 John Corp case #16-12453 Leo Fox Fee Application

Philip:

I am available February 22, 2018, February 23, 2018, February 26, 2018 in the morning and February 27, 2018 March 8, 2018 at 2:00 p.m. and March 9, 2018.

Please advise which days you are available.

Leo Fox, Esq.

630 Third Avenue
18th Floor
New York, New York 10017
(212) 867-9595 - Office
(212) 949-1857 - Fax
leo@leofoxlaw.com

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee, you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient, you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Svetlana_Eisenberg@nysb.uscourts.gov [mailto:Svetlana_Eisenberg@nysb.uscourts.gov]
Sent: Thursday, February 15, 2018 5:33 PM